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TO: MAIL STOP APPEAL BRIEF - PATENTS
Examiner Fadok, Mark A.
FAX NO: 1-571-273-8300
FROM: Gero G. McClellan / David Magness
PAGE(S) with cover: 5

RE:
TITLE: Process for Data Driven Application Integration for B2B
U.S. SERIAL NO.: 09/837,041
FILING DATE: April 18, 2001
INVENTOR(S): O'Brien et al.
EXAMINER: Fadok, Mark A.
GROUP ART UNIT: 3625
CONFIRMATION NO.: 9205

Attached for the above-referenced application please find:

1. REPLY BRIEF

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PATENT
Atty. Dkt. No. ROC920000304US1
PS Ref. No.: IBM2K0304

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

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In re Application of:
O'Brien et al.

Serial No.: 09/837,041

Confirmation No.: 9205

Filed: April 18, 2001

For: Process for Data Driven
Application Integration for B2B

Group Art Unit: 3625

Examiner: Fadok, Mark A.

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September 11, 2006
Date

Joseph Jong

Dear Sir:

REPLY BRIEF

Applicants submit this *Reply Brief* to the Board of Patent Appeals and Interferences in response to the *Examiner's Answer dated July 11, 2006* (hereinafter *Examiner's Answer*). While Applicants maintain each of the arguments submitted in Applicants' previously submitted *Appeal Brief*, Applicants make the following further arguments in light of the *Examiner's Answer*. Please charge any additional fees that may be required to make this Reply Brief timely and acceptable to Deposit Account No. 09-0465/ROC920000304US1.

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ARGUMENT

I. THE EXAMINER ERRED IN REJECTING CLAIMS 1-4, AND 8-12 UNDER 35 U.S.C. § 102(e) AS BEING ANTICIPATED BY *MELTZER*

The Current Rejection

Claims 1-4, and 8-12 are rejected under 35 U.S.C. 102(e) as being anticipated by *Meltzer et al.* (6,125,391).

The Examiner's Definitions

On Page 4, Part 12 of the *Examiner's Answer*, the Examiner provides a list of definitions with which the Examiner construes the claims. Regarding the definitions provided by the Examiner, Applicants submit that, for purposes of prosecution, the claims should be given their broadest reasonable interpretation. Further, irrespective of which of the Examiner's definitions is applied, Applicants submit that the claims are patentable as discussed in Applicants' *Appeal Brief* and for the reasons discussed herein.

The Examiner's Arguments

On pages 5-6 of the *Examiner's Answer*, the Examiner provides additional clarification with respect to the Examiner's previously submitted arguments. Specifically, the Examiner indicates that the previous rejection of the claims is maintained and further directs Applicants to Figure 13 of *Meltzer*. The Examiner states that Figure 13 of *Meltzer* depicts "at least one application present and transforming the format from a requesting entity and mapping the data into a transformed document" at steps 1300-1303. The Examiner further states that there must be metadata produced to defined what the relationship is since the data needs to be transformed back to the original format when sent to the requestor, citing step 1311. The Examiner also states that the router service described in *Meltzer* calls the program that is needed to process

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the service requested by the participant, citing *Meltzer* at Figure 13, steps 1304 and 1310 and Col. 83, Lines 1-30.

Applicants Response to the Examiner's Arguments

With respect to the Examiner's clarifications, Applicants respectfully maintain that the Examiner has still failed to indicate where *Meltzer* describes the claimed subject matter. For example, Applicants' claims (see, e.g., Claim 1) are directed to "a specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol".

With respect to the cited figure, the Examiner has not indicated where *Meltzer* describes a specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format. In describing Figure 13, *Meltzer* merely indicates that a parsed document is translated into the format of the host, for example, from XML to JAVA. Figure 13, Item 1303, Col. 83, Lines 51-52. In describing translation, *Meltzer* indicates "the apparatus for establishing participant interfaces ... includes programs of instructions ... to compile instructions executable by the system to translate the input document to the corresponding data structures." Col. 5, Lines 40-56.

Thus, translation in *Meltzer* is performed by *instructions of a program*. *Meltzer* does not describe "metadata defining a relationship between data of the request in the original format and data of the request in the transformed format". With respect to the Examiner's statement on Page 6 regarding *Meltzer* that "there must be metadata produced to define what the relationship is", the Examiner has neither provided a citation to *Meltzer* indicating where such metadata is shown nor has the Examiner met the burden required to show that such teaching is inherent in *Meltzer*. See MPEP Sec. 2112. Indeed, *Meltzer* specifically teaches that the translation is performed solely by compiled instructions without the benefit of metadata produced from a specification document. Col. 5, Lines 40-56. Finally, Applicants note that *Meltzer* merely refers to a single type of translation from XML to JAVA. Figure 13, Item 1303. Thus, *Meltzer*

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teaches that incoming documents use a single XML format. The Examiner has failed to indicate where *Meltzer* describes metadata that comprises a plurality of metadata instances each configured to support a *different request protocol*. For these reasons, withdrawal of the rejection is respectfully requested.

Finally, with respect to the Examiner's arguments on page 6 of the *Examiner's Answer* that *Meltzer* describes a router service which calls a program, Applicants respectfully reiterate the distinction between "routing" and "calling" described on page 13, paragraph 2 of Applicants' *Appeal Brief*. In light of this distinction, *Meltzer* does not teach "a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format *and to call the at least one application*". Withdrawal of the rejection is respectfully requested.

Conclusion

In conclusion, the cited reference does not teach, show or suggest all of the limitations of the present claims. Accordingly, Applicants respectfully request withdrawal of the rejection of the claims.

Respectfully submitted,

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